

Michael Faillace & Associates, P.C.

Employment and Litigation Attorneys

60 E. 42nd Street, Suite 4510
New York, New York 10165

gnydenskiy@faillacelaw.com

Telephone: (212) 317-1200
Facsimile: (212) 317-1620

June 13, 2019

Via Electronic Filing

The Honorable Judge Lorna G. Schofield
U.S. District Court Southern District of New York
500 Pearl St
New York, NY 10007

Re: Martinez et al v. Stop 1 Deli & 99 Cent Plus Corp. et al
Index No. **19-cv-02662-LGS**

Dear Honorable Judge Schofield:

We represent Plaintiff in the above-referenced matter. We write to respectfully request Your Honor vacate the June 13, 2019 Orders and allow Plaintiff one week to amend the complaint. Plaintiff intends to file an amended complaint in accordance with F.R.C.P. Rule 15. USCS Fed Rules Civ Proc R 15. Thereafter, counsel will immediately serve Defendants with the amended complaint. Subsequent to Defendants' deadline to answer, counsel will request certificate of defaults and will file the default motion within one week thereafter. Therefore, we respectfully request Your Honor's June 13, 2019 Orders be vacated and Plaintiff be allowed one week to amend the complaint.

Respectfully Submitted,

s/ Gennadiy Naydenskiy
Gennadiy Naydenskiy
60 East 42nd Street, Suite 4510
New York, New York 10165
Email: Gnydenskiy@faillacelaw.com
Attorneys for Plaintiffs